

**Determination of NEPA Adequacy (DNA)**  
**U.S. Department of the Interior**  
**Bureau of Land Management**

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OFFICE: Salem District, Tillamook Resource Area, Bureau of Land Management

TRACKING NUMBER: DOI-BLM-OR-S060-2014-0011-DNA

CASE FILE/PROJECT NUMBER: N/A

PROPOSED ACTION TITLE/TYPE: **FY14/15 Tillamook Resource Area Weed Treatments**

(Application of the Herbicide “Aquatic Labeled Glyphosate” and manual / mechanical treatments in accordance with the Westside Salem Integrated NNP Management Plan EA (#OR080-06-09))

LOCATION/LEGAL DESCRIPTION:

Chemical Treatments;

- Little North Fork Wilson River, T. 1S, R. 9W, sections 12, 13, 14.

Manual / Mechanical Treatments;

- Approximately 20 miles BLM jurisdictional roads north of the Nestucca River (see project map).
- The Butte ACEC/RNA; T. 4S, R. 5W, section 19
- Pacific City 80; NW 1/4 T. 4S, R 10W, section 19

APPLICANT: N/A

**A. Description of the Proposed Action and any applicable mitigation measures**

The proposed action is to:

- Chemically treat approximately 6 acres of Himalayan knotweed in discrete patches along an approximately 1.5 mile reach of the Little North Fork Wilson River. The knotweed to be treated is mostly in the riparian zone, with a few scattered pockets upland in a 17 year old conifer plantation. The area will be spot sprayed in the fall of 2014/2015 (October) using aquatic-labeled glyphosate (Aquamaster). This is a follow-up treatment to previous mechanical (mostly ineffective) and chemical treatments.

- Manually and mechanically treat roadside invasive non-native plant species identified on the Oregon Department of Agriculture's noxious weed list in portions of the Nestucca River Watershed (see map). The treatments will target populations that have been identified during inventories conducted in 2013 and 2014. Target species include, but are not limited to, Scotch broom, bull thistle, knapweed, Canada thistle, tansy ragwort, *Geranium lucidum*, and *Geranium robertiana*.
- Manually (hand pulling) and mechanically (weed eaters) treat approximately 2-3 acres of established *Geranium lucidum* in the Butte ACEC/RNA to reduce and/or eliminate this population. Treatments will be accomplished by using youth crews. The ACEC/RNA provides an opportunity for education on invasive species, old-growth plant associations, sensitive plant populations, and historic Indian burns in the Willamette Valley.
- Mechanically and manually treat 49 acres of Scotch broom at the BLM's "Pacific City 80" parcel using service contracts and/or youth crews.

The treatments would occur in Late Successional Reserve and Riparian Reserve Land Use Allocations. The proposed action is described in the Westside Salem Integrated Non-Native Plant Management Plan EA (Jan. 2008). This project incorporates Project Design Features (PDF's) set forth on pages 10-13 of the EA.

## **B. Land Use Plan (LUP) Conformance**

The proposed actions are in conformance with the applicable LUP's because it is specifically provided for in the following LUP decisions: Salem District Record of Decision and Resource Management Plan (RMP). May 1995

- *"Contain and/or reduce noxious weed infestations on BLM-administered lands using an integrated pest management approach. Some noxious weeds expected to be subject to control are tansy ragwort, Canadian thistle, scotch broom, and knapweed."* (RMP p. 64).
- *"Apply integrated pest management methods (e.g., chemical, mechanical, manual and/or biological) in accordance with BLM's multistate environmental impact statement for noxious weed control and the related record of decision."* (RMP p. 64).

## **C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

- Westside Salem Integrated Non-Native Plant Management Plan (EA#OR-080-06-09), January 16 2008, Salem District, Tillamook Resource Area.
- Weed Control EIS/ROD (BLM Northwest Area Noxious Weed Control Program EIS and ROD, (December 1985).

- Weed Control FSEIS (Supplement to the Northwest Area Noxious Weed control Program, Final EIS, (March 1987).
- The Record of Decision, Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States, Programmatic Environmental Impacts Statement (September 2007) and Record of Decision, Bureau of Land Management Vegetation Treatments Using Herbicides on BLM Lands IN Oregon (October, 2010).

#### **Other Related Documents:**

- Salem District Proposed Resource Management Plan/Final Environmental Impact Statement. September 1994 (RMP/FEIS). The RMP/FEIS incorporates the analysis from the Final Supplemental Environmental Impact Statement on Management of Habitat for Late Successional and Old Growth Forest Related Species within the Range of the Northern Spotted Owl, February 1994 (NWFP/FSEIS).
- Programmatic Biological Opinion for Aquatic Restoration Activities in the States of Oregon, Washington, and portions of California, Idaho, and Nevada. (ARBO II) [FWS reference: 01EOFW00-2013-F-0090]
- Reinitiating of the Endangered Species Act Section 7 Formal Programmatic Conference and Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for Aquatic Restoration Activities in the States of Oregon and Washington (ARBO II) [NMFS reference No. NWP-2013-9664].
- Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents with the Range of the Northern Spotted Owl and Standards and Guidelines for Management of Habitat for Late Successional and Old Growth Forest Related Species within the Range of the Northern Spotted Owl. April 1994 (the Northwest Forest Plan, or NWFP).
- Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage Protection Buffer, and other Mitigation Measures Standards and Guidelines (January 2001).

All of the above documents are available for review in the Tillamook Resource Area Field Office located at 4610 3<sup>rd</sup> st, Tillamook, Oregon. Additional information about the proposed project are available in the Westside Salem Integrated NNP Management Plan Project EA Analysis File (NEPA file), also available at the Tillamook Resource Area field office.

#### **Survey and Manage Review**

The Survey and Manage mitigation measure (S&M) has been the subject of numerous legal proceedings since the signing of the Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines, in January 2001. The decision that implements the proposed action described in the Westside Salem Integrated NNP Management Plan EA was made during the time period when there was a question whether the *Record of Decision To Remove the Survey and Manage Mitigation Measure Standards and Guidelines from Bureau of Land Management Resource Management Plans Within the Range of the Northern Spotted Owl* (July 2007) [2007 S&M ROD] was valid. Since that time court rulings have invalidated the 2007 S&M ROD and returned the decision for the Survey and Manage program back to the 2001 S&M ROD. The weed treatments planned for the next two to three years on the Tillamook Resource Area are consistent with the 2001 S&M ROD as amended by the 2001-2003 Annual Species Reviews (not including red tree vole ASR), which is consistent with the February 18, 2014 Remedy Order confirming the 2001 ROD with Annual Species Review as amended.

#### **D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

Yes, the EA considered the implementation of a long term IWM (Integrated Weed Management) Plan to reduce and control NNP (non-native plant) species across the MP (Mary's Peak) and Tillamook RA's (Resource Areas). It includes cultural, physical, biological and chemical control of NNP's in a variety of habitats within LSR (Late Successional Reserve), RR (Riparian Reserve), AMA (Adaptive Management Area), and Matrix LUA's (Land Use Allocations) and also ACEC's (Areas of Environmental Concern). The proposed projects are located in a portion of the analyzed project area (see map and Location Description above).

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

Yes. The Environmental Assessment analyzed and disclosed the predicted environmental effects of two alternatives to the Westside Salem Integrated Non-Native Plant Management Plan; Alternative 1 (No Action) and Alternative 2 (Proposed Action) which was an appropriate range given the purpose and need for the project.

Alternative 1 – was the “No Action” Alternative.

Alternative 2 – The “Proposed Action” implements a Westside Salem Integrated NNP Management Plan that would maintain functioning ecosystems by restoring native plant communities through reduction, control and eradication of NNP species. The BLM needs to

implement this plan to provide for early detection and rapid response on NNP species. The integrated NNP management plan utilizes cultural, physical, biological and chemical control methods. The objectives of the proposed plan are; (1) Reduce or control NNP populations below the level that causes either undue or unnecessary environmental degradation or impairs the public lands economic productivity, and (2) eradicate invading NNP before they become established on public lands.

Both Alternatives are described in detail in EA sections 2.2.2 and 2.2.3. The selected alternative is Alternative 2. No new environmental concerns, interests, resource values, or circumstances have been revealed since the EA was published on January 16, 2008 that should indicate a need for additional alternatives.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

Yes. Several changes in circumstances have occurred and new information has accrued since the EA was published on January 16, 2008, but none has affected the adequacy of the analysis. Notable changes are:

- Since the decision for the Westside Salem Integrated Non-Native Plant Management Plan was signed in 2008 a number of proceedings pertaining to Survey and Manage have transpired. Based on current direction as of May 2014, this project is consistent with Survey and Manage Standards and Guidelines contained in the 2001 S&M ROD. The nature of this project is such that activities will not affect any S&M species because treatments would only occur in and to patches of non-native weeds that are not habitat for S&M species.
- A new BLM State Directors Special Status Species list was released in Dec. 2011. There were no changes to the list that would trigger further survey and analysis consequently this change would not affect the adequacy of the NEPA analysis.
- On October 28, 2008, the USFWS initiated a status review of the red tree vole, including an evaluation of the North Oregon Coast population and the red tree vole throughout its range. On October 13, 2011, after review of the best available scientific and commercial information, the USFWS determined that ESA listing of the North Oregon Coast population of the red tree vole as a distinct population segment (DPS) was warranted. However, they also determined the development of a proposed listing rule was precluded by higher priority actions to amend the lists of Endangered and Threatened Wildlife and Plants. Upon publication of the 12-month petition finding, the USFWS has added this DPS of the red tree vole to their list of candidate species. Pursuant to BLM's procedures regarding the management of candidate species, the North Oregon Coast population of the red tree vole is being managed as a Sensitive Species under the Bureau's Special Status Species Policy; it is also managed as a Survey and Manage Species. The fact that the North Oregon Coast DPS of the red tree vole has been added

to the USFWS candidate species list does not affect the adequacy of the existing NEPA analysis since the project would not affect timber stands which are habitat for red tree voles.

- On June 28, 2011 the U.S. Fish and Wildlife Service released the *Revised Recovery Plan for the Northern Spotted Owl (Strix occidentalis caurina)*. (Spotted Owl Recovery Plan). The plan includes provisions for habitat restoration which could include control and eradication of NNP species.
- On November 21, 2012, in compliance with an order from a U.S. District Court, the USFWS finalized the 2012 designation of Critical Habitat for the spotted owl. The final rule was published in the Federal Register on December 3, 2012 and became effective on January 3, 2013. A portion of this weed treatment project would occur in spotted owl critical habitat but would not alter critical habitat therefore would not have any effect on the function of spotted owl critical habitat.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

Yes, the methodology and analytical approach used for the analysis contained in the EA continue to be appropriate in respect to the current proposed action. (1) There are no new standards or goals for managing resources; there is a revised recovery plan for the Northern Spotted Owl which this proposed action is in full compliance with. (2) There are no changes in resource conditions since the EA was published in 2008, (3) There are no changes in resource related plans, policies or programs or other governmental agencies. (4) There are no new land designations in the project planning area. (5) There are no changes in statute, case law or regulations that would affect the implementation of the Westside Salem Integrated NNP Management Plan.

The EA adequately addresses the impacts (direct, indirect, and cumulative) of the proposed action on the relevant elements of the environment (EA, pg. 17-68). The EA describes impacts to forest vegetation; Endangered Species Act (ESA) listed wildlife species, habitat and /or designated critical habitat; Endangered Species Act (ESA) listed fish species or habitat; water quality; invasive and non-native plant species, soil resources, Bureau Sensitive and Special attention plant and animal species and habitats; Fish species with Bureau Status and Essential Fish Habitat; recreation and visual resources. Impacts from implementing the projects identified for this DNA would fall within the analysis in the EA.

The cumulative effects considered in the EA included those from past, present and reasonably foreseeable future projects on public and private land. No unanticipated actions or events have occurred in the planning area that would have additional cumulative effects.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

Yes. There have been opportunities for public involvement and interagency review associated with the Project EA. In compliance with NEPA, the Westside Salem Integrated NNP Management Plan was listed in the December 2006, March 2007 and June 2007 editions of the Salem District Project Update which were mailed to over 200 individuals and organizations. On March 8, 2007, a scoping letter was sent to 79 individuals, organizations and agencies that were potentially affected and /or interested in management activities in the resource areas as a whole. As a result of this scoping effort one letter providing comments was received. Responses to these comments can be found in Appendix 2 of the EA (pp 69-72).

The EA and FONSI were made available for public review January 23, 2008. Seventy-nine letters were sent to the same individuals, groups and agencies on the scoping list.


### E. BLM Staff Consulted

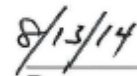
<u>Name</u>	<u>Title/Resource</u>
Andy Pampush	Environmental Coordinator
Matt Walker	Fisheries Resources
Steve Bahe	Wildlife Resources
Kurt Heckerth	Botanical Resources

### Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of the NEPA.

  
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 Signature of NEPA Coordinator

  
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 Signature of Karen M. Schank, Tillamook Field Manager:

  
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 Date

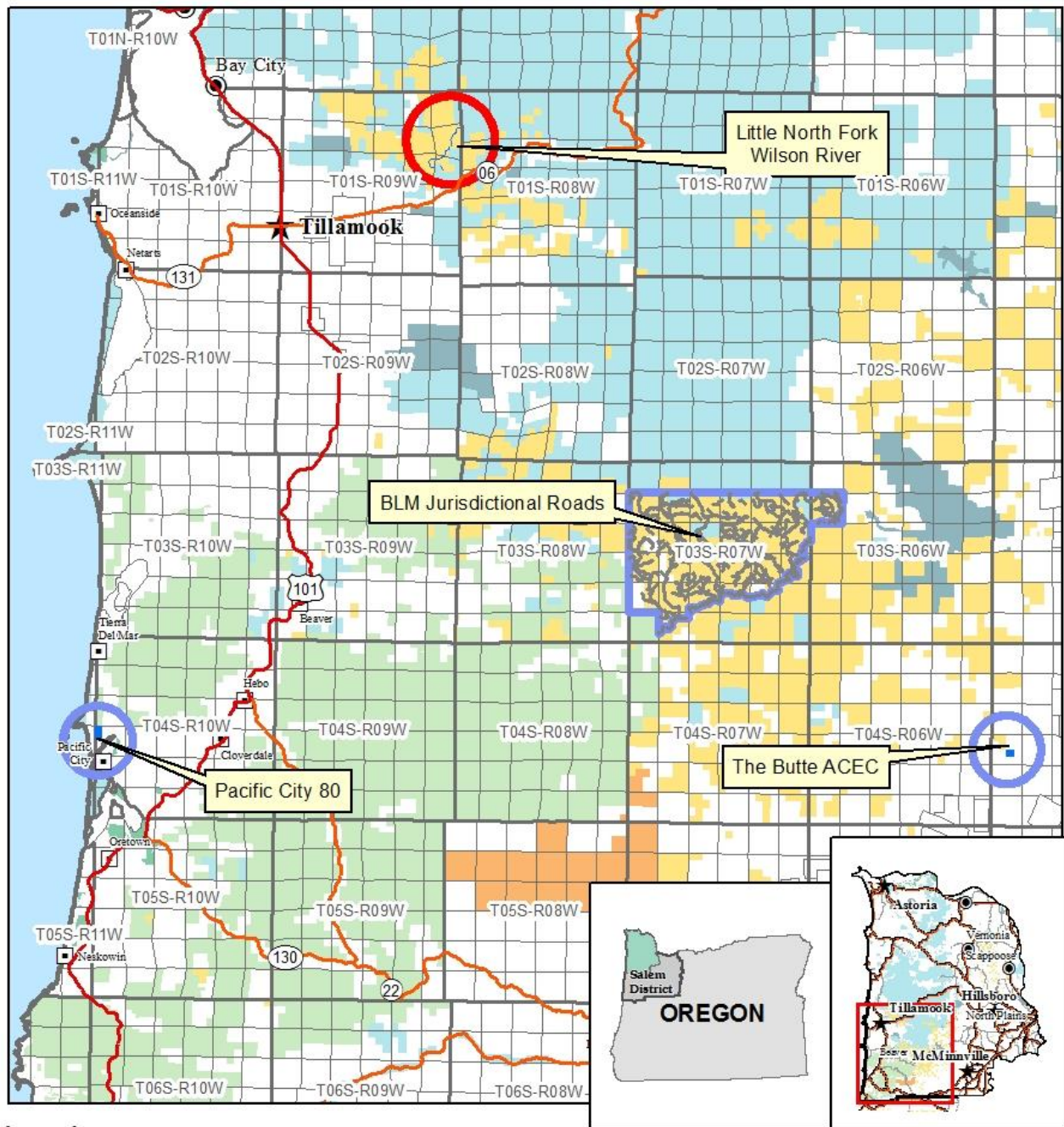
Note: The Decision for the Westside Salem Integrated Non-Native Plant Management Plan which includes the supporting documentation for **FY14/15 Tillamook Resource Area Weed Treatments** project was made in April of 2008 and is no longer appealable. The signed Conclusion on this Worksheet is a step in the BLM's internal process that documents that the analysis for this project is still valid and that no new NEPA analysis is needed.



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
**PROJECT MAP**

Date: 8/19/2014

SALEM DISTRICT-Tillamook Resource Area - OREGON

**Legend****Non-Native Plant Treatment Areas**

Chemical Treatment Area

Mechanical Treatment Area

BLM Jurisdictional Roads

Bureau of Land Management

U.S. Forest Service

U.S. Fish and Wildlife Service

Bureau of Indian Affairs

State

Local Government

Private/Unknown



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Screen Date: 8/19/2014

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